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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DAVID DUONG,

Defendant.

Case No. CR 25-0003 YGR (KAW)

**STIPULATION AND [PROPOSED]
 ORDER TO MODIFY CONDITIONS OF
 RELEASE**

Defendant David Duong and the United States hereby stipulate and agree as follows:

Mr. Duong made his initial appearance on January 17, 2025. The Court set conditions of release, including that Mr. Duong not travel outside the Northern and Eastern Districts of California. By stipulation, the Court subsequently increased the amount of Mr. Duong's bond to \$1,000,000 and permitted him to travel to Vietnam. The purpose of that trip was to participate in mediation related to ongoing litigation involving Vietnam Waste Solutions.

1 The parties now stipulate and agree that Mr. Duong's release conditions should be
2 modified to permit him to travel to Vietnam from June 9 through June 24, 2025, for further
3 mediation proceedings. The parties agree that Mr. Duong is to provide flight information to his
4 assigned pretrial services officer prior to departure, that he may retrieve his passport from
5 Pretrial Services on June 6, 2025 (the Friday before the proposed departure date), and that he is
6 to return his passport to Pretrial Services within 48 hours of his arrival back in California.

7 Pretrial Services Officer Reanna Agah has no objection to the proposed modifications to
8 Mr. Duong's release conditions.

9 IT IS SO STIPULATED.

10 Dated: June 3, 2025

/s/
August Gugelmann
SWANSON & McNAMARA LLP
Attorneys for David Duong

/s/
Abraham Fine
Assistant United States Attorney

17 **[PROPOSED] ORDER**

18 Pursuant to stipulation, Mr. Duong's conditions of release are modified to permit travel to
19 Vietnam from June 9 - June 24, 2025. Mr. Duong may retrieve his passport from pretrial services
20 on June 6, 2025, and he must surrender it to pretrial within 48 hours of return. Mr. Duong is
21 ordered to provide flight information to his assigned pretrial officer prior to departure.

22 IT IS SO ORDERED.

23 Dated: _____

Hon. Kandis A. Westmore
United States Magistrate Court